

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CHLOE HAPPE,

Case No. 4:24-cv-00622

*Plaintiff,*

v.

BLOCK, INC.,

*Defendant.*

**JOINT MOTION TO STAY CASE PENDING ARBITRATION**

Plaintiff Chloe Happe (“Plaintiff”) and Defendant Block, Inc. (“Block” or the “Company”) (together, the “Parties”) hereby jointly stipulate and respectfully move for an Order staying this lawsuit pending arbitration.

In support of this Motion, the Parties stipulate and agree that:

1. On or about July 18, 2019, Block extended to Plaintiff an offer of employment.

Also on July 18, 2019, Plaintiff accepted the offer by signing an offer letter using DocuSign technology. By signing the offer letter, Plaintiff agreed to the accompanying Arbitration Agreement, under which she and Block agreed to submit to arbitration “all disputes between [Plaintiff] and the Company (including its subsidiaries, affiliates, successors, partners, employees, officers, directors, insurers, agents, investors, contractors, and vendors).” A true and correct copy of the offer letter and the accompanying Arbitration Agreement is attached hereto as **Exhibit A**.

2. On March 28, 2024, Plaintiff filed suit against Block in the Forty-Fifth Circuit Court, Lincoln County, Missouri, asserting a claim against Block for alleged wrongful termination in violation of Missouri Revised Statute § 130.028. Dkt. 1, Ex. A. On May 3, 2024, Block timely removed the case to this Court. Dkt. 1. On May 23, 2024, Happe moved to have the case remanded

to State court. Block opposes this motion.

3. On April 26, 2024, Block shared with counsel for Plaintiff a copy of Plaintiff's signed offer letter and the accompanying Arbitration Agreement and asked that Plaintiff consent to arbitration. On May 6, 2024, the Parties met and conferred regarding the Arbitration Agreement. Subsequently, the Parties agreed to submit this dispute to binding arbitration pursuant to the Arbitration Agreement and to seek a stay of this proceeding while the arbitration is pending. The parties have agreed that arbitration will take place in St. Louis, Missouri.

4. A stay of this proceeding pending completion of the arbitration is appropriate under the Federal Arbitration Act. *See* 9 U.S.C. § 3 (where a plaintiff brings a suit "upon any issue referable to arbitration under an agreement in writing for such arbitration," the court "shall on application of one of the parties stay the trial of the action until such arbitration has been had in accordance with the terms of the agreement," so long as the court is "satisfied that the issue involved in such suit or proceeding is referable to arbitration").

THEREFORE, subject to the approval of this Court, it is hereby stipulated and agreed that:

- a. This action shall be submitted to binding arbitration pursuant to the terms of the written Arbitration Agreement signed by Plaintiff with the exception that arbitration shall take place in St. Louis, Missouri rather than San Francisco County, California; and
- b. All proceedings in this action, including but not limited to any motion for remand to Lincoln County, Missouri, Circuit Court, and any deadline to oppose such motion, shall be stayed pending the completion of the arbitration.

For the convenience of the Court, a Proposed Order is submitted contemporaneously with this Joint Motion.

Respectfully submitted,

*/s/ Timothy Belz (with permission)*

Timothy Belz, Bar No. 31808MO  
CLAYTON PLAZA LAW GROUP, LC  
112 South Hanley  
Suite 200  
St. Louis, MO 63105  
Telephone: 314.726.2800  
Facsimile: 314.863.3821  
tblz@olblaw.com

*Attorney for Plaintiff Chloe Happe*

*/s/ Patricia J. Martin*

Patricia J. Martin, Bar No. 57420MO  
Lillian T. Manning, Bar No. 68432MO  
LITTLER MENDELSON, P.C.  
600 Washington Avenue  
Suite 900  
St. Louis, MO 63101  
Telephone: 314.659.2000  
Facsimile: 314.667.3760  
pmartin@littler.com  
lmanning@littler.com

Jason C. Schwartz, *Admitted Pro Hac Vice*  
Naima L. Farrell, *Admitted Pro Hac Vice*  
Catherine McCaffrey, *Admitted Pro Hac Vice*  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539  
jschwartz@gibsondunn.com  
nfarrell@gibsondunn.com  
cmccaffrey@gibsondunn.com

*Attorneys for Defendant Block, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed on this May 23, 2024 electronically using the court's electronic filing system which will send notice to all counsel of record in this case.

*/s/ Patricia J. Martin*  
Patricia J. Martin